



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

reading file

January 19, 2005

Jeff Steinmetz
BLM Las Vegas Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130-2301

Subject: Final Environmental Impact Statement (FEIS) for the Las Vegas Valley Disposal Boundary, Clark County, Nevada (CEQ #040584)

Dear Mr. Steinmetz:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for the Las Vegas Valley Disposal Boundary. We rated the DEIS as "Environmental Concerns - Insufficient Information (EC-2)." We raised several issues to the Bureau of Land Management (BLM) in our comment letter, including impacts to wetlands and Waters of the U.S., general conformity under the Clean Air Act, the analysis of alternatives, and consultation with Tribal Governments.

EPA is pleased that the issues identified in our review of the DEIS have been evaluated and addressed in the FEIS. In response to comments from EPA, BLM clarified information in the document pertaining to aquatic resources, analysis of alternatives, and general conformity under the Clean Air Act. In addition, information was provided on the Clean Water Act Section 404 permitting process and Section 303(d) status of the Las Vegas Wash.

BLM concurrently released the FEIS and the Record of Decision (ROD). In the ROD, BLM identifies the Conservation Transfer Alternative (CTA) as the environmentally preferred alternative, and selects that alternative over the proposed action. We commend BLM for selecting the CTA. The ROD indicates that additional groundwork is required to develop conservation agreements under the CTA, and that BLM will complete the appropriate NEPA documentation as required to ensure resources are protected. EPA encourages BLM to continue to work with all stakeholders in this process. It is important that the Las Vegas Wash, both the Upper and Lower sections, be viewed and protected as a single system, in its entirety, to ensure that their functions and values are preserved and the integrity of the wash is maintained. The

designation of adequate buffers along either side of the wash is an essential criteria to achieve this goal, and to protect special status plant species such as the Las Vegas bearpoppy and the Las Vegas buckwheat, as well as other valuable resources.

We appreciate the effort that has been made to address our concerns and the opportunity to review this Final EIS and ROD. If you have any questions, please contact me or David Schmidt, the lead reviewer for this project. David can be reached at 415-972-3792 or schmidt.davidp@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa B. Hanf". The signature is fluid and cursive, with the first name "Lisa" being more prominent than the last name "Hanf".

Lisa B. Hanf, Manager
Federal Activities Office
Cross Media Division

cc: Las Vegas Valley BLM Land Disposal EIS, PBS&J